## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO BENNETT, on behalf of herself and all others similarly situated,

Plaintiff

Case No. 2:24-cv-00592-JMY

v.

SCHNADER HARRISON SEGAL & LEWIS LLP, et al.,

**Defendants** 

## PLAINTIFF'S MOTION TO STAY, VACATE DEADLINES, AND FOR A REFERENCE TO A MAGISTRATE JUDGE FOR FURTHER SETTLEMENT CONFERENCE

Plaintiff Jo Bennett, through her undersigned counsel, hereby moves for a stay of this action based on the parties' recent mediation. Plaintiff also requests if the parties have not signed a term sheet by November 12, 2024 the parties be ordered to attend a settlement conference with United States Magistrate Judge Carol Sandra Moore Wells. It is unclear if Defendants oppose any of the relief requested herein. For the reasons set forth in the attached memorandum in support, Plaintiff's motion should be granted.

Respectfully submitted,

/s/ Adam H. Garner

Adam Harrison Garner (320476) Melanie J. Garner (315058) The Garner Firm, Ltd. 1617 John F. Kennedy Blvd., Suite 550 Philadelphia, PA 19103

Tel: (215) 645-5955 Fax: (215) 645-5960 adam@garnerltd.com melanie@garnerltd.com

R. Joseph Barton (*Pro Hac Vice*) Barton & Downes LLP 1633 Connecticut Ave, Suite 200 Washington D.C. 20009 Tel: (202) 734-7046 jbarton@bartondownes.com

Attorneys for Plaintiff

Dated: October 22, 2024

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of October, 2024, a copy of the foregoing was served on all counsel of record using the Court's CM/ECF system.

/s/ Adam H. Garner Adam Harrison Garner